



**THE CITY OF NEW YORK
LAW DEPARTMENT
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December 2, 2025

Via ECF

Honorable Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Trabacchi v. Department of Education of the City of New York, et al.
24-cv-06123 (RPK)(TAM)

Dear Judge Merkl,

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, assigned to represent Defendants in the above-referenced action. I write to respectfully request a brief extension of time, from December 4, 2025, to December 12, 2025, for Defendants to file their Motion to Dismiss the Amended Complaint. The requested extension is necessary because I need additional time to draft and finalize Defendants' Motion, and in order to provide sufficient time for client review. This is Defendants' second request for an extension of time to file its Motion to Dismiss the Amended Complaint. Plaintiff does not consent to this extension "due to their bad faith and not discussing settlement with me, as ordered by the Court." The parties, however, spoke via TEAMS on November 26, 2025 about settlement.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Brigid Lynn
Brigid Lynn
Assistant Corporation Counsel

Cc: Plaintiff (via email)